

# REVIEW BY THE U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID) OF ASSISTANCE PROJECTS CONSIDERED BY MULTILATERAL DEVELOPMENT BANKS

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#### Introduction

The United States International Financial Institutions Act<sup>1</sup> directs the United States Government (USG) to strengthen the environmental and social performance of each multilateral development bank (MDB) in which the United States is a shareholder. To this end, the U.S. Agency for International Development (USAID) leads pre- and post-approval<sup>2</sup> field reviews of selected MDB projects.<sup>3</sup> The teams that perform these reviews are composed of technical specialists from USAID's Missions and headquarters and, in some cases, from other federal departments and agencies.

USAID's pre- and post-approval field reviews yield findings and recommendations intended to improve the environmental and social performance of MDB projects. Post-approval reviews also evaluate the incorporation and effectiveness of any previous USG recommendations and/or assess an MDB's implementation of its safeguard policy.

USAID's pre- and post-approval field reviews are distinct from, but related to, the USG loan reviews and other Congressionally mandated MDB oversight functions led by the U.S. Department of the Treasury. Both pre- and post-approval field reviews can inform USAID's input into future USG reviews of MDBs' safeguard policies and guidance.

USAID publishes the resulting reports on its public website<sup>4</sup> and distributes them to stakeholders. USAID also translates the executive summaries of reports into local languages, as appropriate.

The U.S. International Financial Institutions Act further directs USAID to report semi-annually to Congress on its reviews of MDB projects. This report covers the period from October 2020 through March 2021. During this time, USAID advanced its reviews of projects in Samoa and Tanzania. USAID also initiated a piloted process to more strategically approach MDB project reviews.

<sup>&</sup>lt;sup>1</sup> Relevant sections of Title XIII of the U.S. International Financial Institutions Act are available at: https://www.usaid.gov/our\_work/environment/compliance/title13.

<sup>&</sup>lt;sup>2</sup> Here, "approval" refers to a vote to approve financing by a Board of Executive Directors at an MDB. USAID can conduct a pre-approval field review any time prior to a vote by an MDB Board, and a post-approval field review any time after approval by an MDB Board.

<sup>&</sup>lt;sup>3</sup> Here, "projects" includes any type of MDB investment (e.g., project loan, technical assistance, development policy loan, risk or loan guarantee, and grant) at any phase of the investment cycle: from identification to closure.

<sup>&</sup>lt;sup>4</sup> USAID's repository of project review reports and summary reports to the U.S. Congress is available at https://ecd.usaid.gov/mdb.php. Please note that as of March 2021, this site is down for maintenance.

## **Process of Conducting Field Reviews**

USAID conducts reviews on a subset of MDB projects that are "particularly likely" to have "substantial" adverse environmental or social impacts, including on natural resources, public health, or indigenous peoples. <sup>5</sup> USAID selects MDB projects for review following consultation with our Bureaus in Washington, D.C.; our field Missions; the Offices of the U.S. Executive Director to the MDBs; the U.S. Departments of the Treasury and State; and other stakeholders, such as civil society organizations, subject matter experts, and the staff of MDBs.

Generally, USAID collects information from, and frames its analysis by, the following:

- Relevant U.S. legislation;
- Previous USG recommendations on a project or MDB safeguard;
- MDBs' safeguard policies and guidance;
- International best-practice standards;
- Publicly disclosed MDB project documents;
- Reports by civil-society organizations, academic institutions, and others;
- Site observations;
- Meetings with stakeholders and experts; and
- Meetings with people affected by a project.

USAID's reviews can address any component of the assessment and management of environmental and social impacts, including the following:

- Capacity of the borrower(s);
- Screening;
- Definition of the project's area of influence;
- Scoping;
- Analysis of alternatives;
- Baseline data:
- Assessment of direct, indirect, and cumulative impacts;
- Assessment of impacts from associated facilities; and
- The design and implementation of mitigation measures.

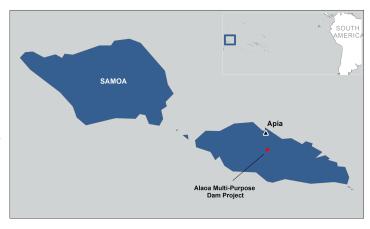
USAID's reviews often focus on environmental and social issues formally raised to MDBs by the USG through periodic reviews of their safeguard policies or other processes. Unless specified, USAID's review findings and recommendations apply to specific cases, and are not generalizable. Reviews can highlight good practices as well as areas for improvement.

<sup>&</sup>lt;sup>5</sup> This language is provided for in Title XIII of the U.S. International Financial Institutions Act, Section 1303(a)(3), available at https://www.usaid.gov/our\_work/environment/compliance/title13.

#### Annex I - Current and Recent Reviews

# I. Independent State of Samoa – Alaoa Multi-Purpose Dam Project (Asian Development Bank)

The proposed Alaoa Multi-Purpose Dam Project (the Project), located on the Vaisigano River above the Samoan capital city of Apia, will develop a 60-meter-high roller-compacted concrete design dam with an indicative reservoir storage volume of four million cubic meters and a run-of-river small hydropower plant with an indicative installed capacity of 0.60 megawatts.



The primary objective of the Project is flood prevention and protection of key infrastructure. The secondary objective is provision of water supply during dry periods and reduction of turbidity during flood periods. The tertiary objective is small-scale hydropower generation. The Project includes an Output focused on capacity strengthening for project management. The Asian Development Bank (ADB) and Government of Samoa (GoS) staff explained to USAID that the final iteration of the Project will include an additional two-part Output focused on flood management and biodiversity conservation.

Travel restrictions and other COVID-19-related constraints have delayed project preparation processes, including biodiversity and other assessments, and have pushed back the Project timeline.

In consultation with other U.S. federal agencies, USAID chose to review this Project because of its unprecedented (for Samoa) size and scope, likely adverse impacts (particularly to biodiversity), potential legacy land issues, and concerns regarding community consultation raised in a previous ADB project in Samoa.

The review was informed by literature reviews and by interviews and correspondence with subject matter experts, local and international stakeholders, project-affected people, and staff from the GoS and ADB. COVID-19-related travel restrictions prohibited a field component.

The following are near final findings and recommendations from USAID's forthcoming report.

<u>Finding I</u>: Analysis of the Project's expected biodiversity impacts and design of mitigation plans remain contingent on collecting significant amounts of additional data, posing concerns for the plans' efficacy.

#### Recommendations:

- a. ADB should support the Project to amend the terms of reference (ToRs) of the international biodiversity and environmental flow consultants or hire additional consultants to address residual data and mitigation planning gaps such as those identified in this report.
- b. ADB should carry out its intention that the biodiversity management and monitoring plan (BMMP) and biodiversity offset plan (BOP) identify additional biodiversity loss mitigation measures, integrate the measures into project design (e.g., not as alternatives to be considered), and budget for their implementation.
- c. ADB should carry out its intention to complete the BMMP and BOP, and their respective resourcing and financial plans, prior to Board consideration of the Project. This intention is a welcomed and encouraging good practice that will allow the Borrower and the Board to have a better understanding of the Project's requirements, impacts, and costs. The Project should not move forward for Board consideration without the BMMP and BOP.

<u>Finding 2</u>: Cumulative impacts do not appear to have been sufficiently considered in the design of the project or in the proposed mitigation plans, raising concerns that the project's potential impacts may be larger than expected.

#### Recommendations:

- a. The Project should amend the ToRs of the international biodiversity and environmental flow consultants or hire additional consultants to more fully assess and mitigate cumulative impacts (e.g., on page 2 of the ToR for the terrestrial ecologist, cumulative impacts should be included alongside direct and indirect impacts).
- b. The Project's cumulative impacts assessment should inform the infrastructure design and the safeguards implementation and monitoring plans.
- c. The Project should incorporate data and information from the GCF/UNDP Vaisigano Catchment Project including, but not limited to, biodiversity surveys, as-built designs, environmental flow models, and upper catchment restoration plans.
- d. The Project should incorporate catchment and basin-wide data and plans including, but not limited to, the proposed plans for integrated flood management.

<u>Finding 3</u>: The planned inclusion of a new Project Output could help address the integrated nature of water management, disaster risk, and climate change in the Greater

Apia community and the need for local capacity strengthening on these issues and on environmental and social safeguards implementation.

#### Recommendations:

- a. ADB should follow through on its intention to include a new Project Output to support and build the capacity of the Ministries of Works, Transportation and Infrastructure (MWTI) and Natural Resources and Environment (MNRE) to conduct the analyses and modeling necessary to incorporate climate information into the proposed plans for integrated flood management and to design non-structural mitigation measures, including those recommended in the Greater Apia Integrated Water Management Plan.
- b. ADB should continue to encourage and further facilitate coordination between the Alaoa Multi-Purpose Dam Project and the GCF/UNDP Vaisigano Catchment Project as part of the final technical design of the structural measures of the Project and in the design of the analyses, management plans, and non-structural measures included in the new Output.
- c. ADB should continue to work with MNRE to assess the effectiveness and scalability of past and present catchment restoration initiatives, their potential to mitigate flood damage and reduce sedimentation behind the future Alaoa Multi-Purpose Dam, and the capacity of MNRE to implement prioritized initiatives. These assessments should inform the design of the new Output.

<u>Finding 4</u>: Analysis and consultation on potential land-related disputes appears thorough and well documented. Notwithstanding, interviewees described residual concerns and confusion.

- a. As appropriate, ADB should consider supporting further assessment of potential legacy land issues to provide a more robust evidential foundation for resolving contemporary concerns and clarifying confusion. Examples of possible further assessment include identifying and analyzing relevant New Zealand colonial archival documents housed in Wellington and proactively soliciting and analyzing relevant land-related documents belonging to stakeholders.
- b. ADB should support the Project to publicly disclose and actively and widely disseminate English and, as requested, Samoan language versions of the May 2019 Stakeholder Consultation Report as a standalone document as soon as possible.
- c. ADB should support the Project to follow through on the existing plan to form a multi-agency grievance redress committee and broadly disseminate information regarding the project-level grievance redress mechanism.

- d. ADB should support the Project to provide more detailed guidance to potentially affected people regarding the differing legal mechanisms available to resolve disputes on customary versus freehold and public/government land.
- e. ADB should continue to support the Project to assess and prioritize catchment restoration initiatives that potentially could provide income and livelihood benefits to households that previously accessed, used, and benefited from the large tract of government land in the Vaisigano catchment.

<u>Finding 5</u>: The Project requires significant and wide-ranging capacity to effectively implement and manage the multi-purpose dam because of the potential environmental and social impacts and multiple intended purposes. The Borrower's capacity to effectively implement and manage the broad range of project elements and mitigation plans is unclear.

- a. ADB should work with the GoS to assess the Ministry of Finance, Electric Power Corporation (EPC), MNRE, Ministry of Works, Transportation, and Infrastructure, and other relevant/involved ministries' capacity to perform the following key project-specific functions: operating the dam for flood control, drinking water storage, hydropower generation, and environmental flow regulation; designing and using catchment and storage models and real-time data to optimize the multiple purposes of the dam; dam safety and executing emergency response plans; dam maintenance, including reservoir de-sedimentation; protecting biodiversity; developing, implementing, maintaining, and monitoring a biodiversity offset; monitoring ongoing direct, indirect, and cumulative impacts; implementing procedures regarding economic displacement; meaningfully engaging project-affected people and other stakeholders; and eliciting and resolving project-related grievances.
- b. ADB should commit to implementing the capacity building plans developed by the project consultants (as described in the ToRs), as well as any other capacity building measures deemed relevant, including those identified above.
- c. ADB should provide capacity building (as well as verification that capacity levels subsequently meet the needs of the Project and its associated risks) and require adequate capacity prior to project start for EPC or other involved parties with insufficient capacity.
- d. ADB should incorporate capacity building efforts that strengthen long-term local capacity in the key areas identified above, especially those that ensure adequate implementation of environmental and social safeguards. These capacity building efforts should enable future projects to proceed effectively and sustainably without dependence on international consultants, whose participation may not be feasible (such as during the COVID-19 pandemic).

- e. ADB should work with GoS to ensure that the Borrower has adequate human and financial resources to conduct systematic and ongoing monitoring of native and invasive species in the catchment, to identify trends in population and distribution, and to assess related impacts.
- f. ADB should consider adding a Project Objective on capacity strengthening to emphasize its importance to the success and sustainability of this and related Projects.

<u>Finding 6</u>: Consultation with potentially directly-affected Project stakeholders prior to March 2020, appears to have been thorough but COVID-19-induced project delays have created an extended gap in consultations. These delays present a unique opportunity to improve information disclosure, engage the broader population, directly and publicly respond to stakeholder suggestions and concerns, and avoid a prolonged consultation gap.

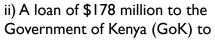
- a. Building on the consultation documentation in the Resettlement Plan and Stakeholder Consultation Report, and consistent with ADB policy on confidentiality, ADB should support the Project to develop and disclose a response document that clearly and directly documents stakeholder concerns and/or suggestions and the Project's decisions in response, including justifications. Information that would violate privacy rights should be withheld from the publicly disclosed document.
- b. ADB should support the Project to target engagement efforts toward a broader set of interested and potentially-indirectly-affected people, including civil society organizations.
- c. Applying lessons learned from stakeholder engagement in restrictive environments and during the ongoing pandemic, and in close coordination with GoS, ADB should support the Project to immediately resume stakeholder consultation processes to limit the consultation gap created by COVID-19-induced project delays.

# 2. Multinational – East African Coastal Corridor Development Project (African Development Bank)

On December 12, 2019, the Board of Executive Directors of the African Development Bank (AfDB) approved Phase I of the East African Coastal Corridor Development Project. The total cost of Phase I of the project is \$457 million, and its implementation timeline is five years: 2020 – 2025.

Phase I consists of the following:

i) A loan of \$178 million to the Government of Tanzania (GoT) to pave a largely existing earthen road that stretches 121 km from the coastal town of Pangani to the inland town of Mkange.



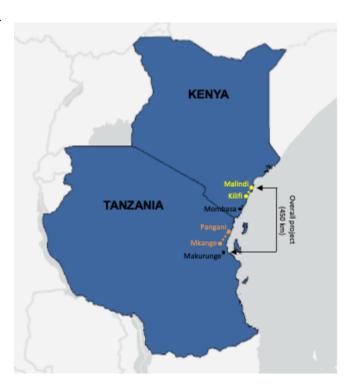
widen an existing tarmac road that stretches 54 km from the coastal town of Kilifi south to Mombasa, Kenya's second largest city; and



- i) A loan to the GoT to pave a largely existing earthen road that stretches 125 km between Mkange and Makurunge; and
- ii) A loan to the GoK to widen two sections of an existing tarmac road:

Northern section: Malindi to Kilifi (48 km, see yellow dotted line, above); Southern section: Mombasa to the border with Tanzania (106 km)

USAID conducted a pre-approval field review of a section of Phase II in Kenya: the Malindi – Kilifi Road (see yellow dotted line, above). Final findings and recommendations were reported in a 2021 report that is available in full in English on USAID's public website. A companion document in Kiswahili – comprising the report's executive summary and responses from AfDB and KeNHA – is also available on USAID's public website.



USAID conducted a pre-approval field review of a section of Phase I in Tanzania: the Pangani – Mkange Road (see orange dotted line, above). Final findings and recommendations are reported below and will be posted on USAID's public website along with a companion document in Kiswahili.

### Review of a Tanzanian Section of Phase I: The Pangani - Mkange Road

The Tanzania National Roads Agency (TANROADS) will implement the Pangani – Mkange Road project. It is primarily intended to support fisheries and subsistence and commercial agriculture by improving access to markets, and to spur tourism to Saadani National Park and nearby beaches.

A multidisciplinary review team of technical specialists from USAID and the U.S. Department of the Treasury visited Dar es Salaam and the project area from August I – 15, 2019. A literature review, more than 40 interviews with project stakeholders and experts, and observations in and around the project area informed the review. The review team triangulated methods as much as practicable.

<u>Finding I</u>: The project's development objectives appear well-aligned with two priorities of local communities: transport facilitation and agricultural development. Opportunities for improvement include sensitizing project-affected people regarding road safety behaviors and strengthening their capacity to employ integrated pest management (IPM) techniques.

- a. To help avoid potential adverse impacts of transport facilitation, AfDB and TANROADS should include in the Environmental and Social Management Plan:
  - i. A provision for sensitizing project-affected communities regarding road and pedestrian safety behaviors prior to construction as well as during construction and operation. Sensitization material should be delivered in culturally appropriate venues, such as schools, and should be targeted to the needs of all children, including students, non-enrolled primary and secondary school-aged children, and disabled children. Sensitization material may cover topics such as gauging the speed of different oncoming vehicles, using crosswalks and bus bays, and understanding signs intended to protect pedestrians and livestock on and near the road; and
  - ii. A provision to conduct a road safety audit prior to completion of construction to ensure that road safety features have been implemented according to the Environmental and Social Management Plan.
- b. To help avoid potential adverse impacts of transport facilitation, AfDB and TANROADS project should include in the Environmental and Social Monitoring Plan:
  - i. A provision for monitoring the knowledge of road safety behaviors among project-affected communities during the pre-construction and construction

- phases, and the number of human and livestock casualties during construction and operation; and
- ii. A provision to assess the effectiveness of safety mitigations regularly and upon receipt of a complaint or a report of injury.
- c. To help realize the development objective of agricultural development, AfDB and TANROADS project should consider adding a component to strengthen the capacity of women and men farmers to employ IPM techniques and, where appropriate, to safely select, use, store, and dispose of chemical pesticides. This proposed component likely would necessitate developing a Pesticide Management Plan.

<u>Finding 2</u>: The original Environmental and Social Impact Assessment (ESIA, dated '21 January 2019') and the first, but not the final, revised ESIA (dated 'July 2019') do not reference or fully comply with the current AfDB Integrated Safeguards System (approved in 2013).

#### Recommendations:

- a. AfDB should ensure that the project's ESIA is thoroughly revised to remove references to outdated AfDB environmental and social policies and guidance.
- b. AfDB should ensure that the project's ESIA is thoroughly revised to add references to and information and analysis consistent with all applicable provisions of the current Integrated Safeguard System, including guidance material.
- c. AfDB should pursue opportunities to strengthen pre-approval environmental and social due diligence on future projects, e.g., by increasing safeguards staffing and capacity.

Update: In response to draft recommendations a and b, AfDB explained that this was a simple oversight and would be corrected. Soon thereafter, in September 2019, AfDB and TANROADS further revised the ESIA to correct the references (also see Finding 3 for AfDB efforts to add references to and information and analysis consistent with applicable provisions of the current Integrated Safeguard System). The further-revised ESIA is what the Board considered when voting to approve the loan (also see Annex 5 for the U.S. statement at the Board vote). In response to recommendation c, AfDB noted its public commitment to increase staffing and build the capacity of the Safeguards Unit as well as to provide additional environmental and social training for staff across the institution.

<u>Finding 3</u>: Where the Phase I project passes through and near Saadani National Park, it will likely adversely impact threatened and endangered species. The July 2019 ESIA does not include baseline data that are sufficient to adequately define critical habitat and ecosystem services; identify which alternative alignment(s) best avoid biodiversity-related risks and impacts; design appropriate mitigation measures; and develop an ecologically meaningful monitoring regime.

#### Recommendations:

- a. AfDB should ensure that Chapter 4 of the project's ESIA is revised to include additional baseline data about the presence of threatened and endangered species, critical habitat, and ecosystem services in the project's 'core' and 'indirect' impact zones. Additional data can be collected relatively quickly and inexpensively via a desk study of peer-reviewed scientific literature about the biology, ecology, and conservation status of the Eastern Coastal Forest biodiversity hotspot, Saadani National Park, and its Zaraninge Forest Reserve. A subset of such data, as determined by biodiversity expert(s), should then be verified and updated via a field-based study of relevant sites.
- b. Based on these additional baseline data, AfDB and TANROADS should reconsider the alternatives analysis to determine whether the proposed alignment maximally avoids adverse impacts to key species, critical habitat, and ecosystem services.
- c. Once the road alignment has been reconsidered, as indicated by the additional baseline data, AfDB and TANROADS should revise the Environmental and Social Management Plan and Environmental and Social Monitoring Plan to include data-based measures to manage and monitor any residual impacts. If, as a last resort, a biodiversity offset program is necessary per OS 3, AfDB should engage international experts to design and fund an offset for the life of the project.

Update: In response to draft recommendation a, the GoT Minister of Finance committed to include in the project's advanced procurement package a provision and associated budget line item to collect additional baseline data on threatened and endangered species and critical habitat as part of a previously planned survey. Moreover, AfDB shared a draft of the Terms of Reference for this survey with the USAID review team and incorporated much of the team's technical input and suggestions regarding gender differentials and health impacts.

<u>Finding 4</u>: The road will facilitate harvest and transport of wildlife, forest, and marine resources. Increasing access without instituting protections is likely to drive further poaching and trafficking. Moreover, knowledge of the project is spurring land speculation and tourism development. Local communities do not appear well-positioned to manage or benefit from these external pressures.

#### Recommendations:

#### a. Wildlife

i. TANROADS should work with TANAPA to better understand illegal natural resource extraction and identify key points on the project road where movement of poachers and illegal wildlife products is relatively likely.

ii. GoT should consider training law enforcement on human rights and land and resource rights to prevent inappropriate use of force, and then re-allocating them to the key points on the road (identified per recommendation i.)

#### b. Forests

- i. To increase enforcement of the Wilderness Zone status of Zaraninge Forest Reserve, AfDB should advise SANAPA to erect beacons to indicate the boundary of the Reserve and further sensitize local communities regarding sustainable charcoal-making and firewood collection areas outside the Reserve.
- ii. To avoid potentially significant adverse environmental risks and impacts to the Zaraninge Forest Reserve, AfDB should use the proposed biodiversity baseline data (see recommendations under Finding 3) to re-consider alternative alignments that would result in little to no disturbance to the areas of vegetation with highest conservation value.

#### c. Fisheries

i. AfDB should seek opportunities (under this project or a follow-on project) to sensitize communities and provide resources for them to form fisherfolk associations or cooperatives as an alternative to operating as individual entrepreneurs. Members of the recommended association or cooperative could leverage their coordination in a variety of ways, e.g., collecting and sharing data about catches in different areas over time; using catch data to develop a sustainable fisheries management plan; and combining individual revenue to purchase larger boats and sustainable technologies (which, ideally, would be used according to the proposed sustainable fisheries management plan).

#### d. Land

i. AfDB and TANROADS should coordinate with the GoT Ministry of Lands to further educate project-affected people about the risks of land speculation and the benefits of maintaining rights/claims to open land and resources on it (such as mango trees and cassava plants) and structures (such as houses) at least until prices go up. Where community-based education campaigns already exist, such as in Pangani District, these should be supported. In areas that have none, TANROADS and the Ministry of Lands should work with local government Community Development Officers to invite and capacitate (through transportation, education materials, a stipend, etc.) neighboring ones to provide such services.

#### e. Tourism

 AfDB should consider funding a project component to further strengthen the capacity of project-affected people to leverage ecotourism opportunities. The component could, for example, provide seed money or support in developing business plans. <u>Finding 5</u>: Healthcare facilities in the project area do not appear to meet communities' current needs regarding maternal health and HIV. Communities are concerned that the project will lead to additional unwanted pregnancies and HIV transmission and thus welcome the project to provide sensitization and education on prevention.

#### Recommendations:

- a. AfDB should follow through on its plan (as indicated in the Project Cost Detail table) to fund the purchase of ambulances, which can increase accessibility to services for project-affected expectant mothers among other patients.
- b. TANROADS should follow through on its plan (as written in Sections 3.2.12 and 3.3.21 of the ESIA) to minimize HIV-related risks and impacts by developing and implementing an HIV/AIDS Mitigation Plan in coordination with the Ministry of Health. The plan should align with the latest GoT technical guidance for HIV service delivery.
- c. AfDB should fund community-based or local health professionals (rather than non-resident personnel) to deliver the project's HIV prevention sensitization and education material to project-affected communities and labor camps.
- d. AfDB should explore future opportunities to support GoT in strengthening the human capital and material resources in rural and low-resource health facilities, e.g., maternity homes and dispensaries.

<u>Finding 6</u>: Government actions regarding civil society engagement are limiting the ability of individuals, communities, and organizations to meaningfully engage in this project.

- a. AfDB should include in relevant project documents, such as the Stakeholder Engagement Plan, provisions to enable individuals and organizations to safely and meaningfully participate in the project. Provisions may include those to 1) lower logistical and financial barriers to accessing project information, including online; and 2) mitigate barriers to safe and meaningful participation in project consultations, including inequalities and discrimination against vulnerable and historically marginalized groups.
- b. AfDB should ensure that the project's grievance redress mechanism is designed and resourced with attention to possible intimidation, repression, threats, and assault against those who raise questions or complainants against the project during planning or implementation.
- c. AfDB and TANROADS should proactively advertise and sensitize project-affected communities on the Bank's Independent Review Mechanism as an additional, separate means of redress.

## Annex II – Piloting a More Strategic Approach to USAID Reviews of MDB Projects

USAID, in consultation with the Department of Treasury, is designing and piloting a process to more strategically approach USAID reviews of MDB projects. USAID expects these process improvements to enhance its effectiveness at strengthening environmental and social safeguard performance at the MDBs through improved implementation of its mandates in IFI Act Title XIII Sections 1303 and 1307 as well as Pub.L. 113-235. The piloted process will:

- Place greater emphasis on consultation with USAID Missions to identify MDB projects for review well in advance of MDB Board votes on those projects;
- Initiate earlier desk reviews of the environmental and social impact assessments for identified MDB projects;
- Increase Mission engagement in pre- and post-approval (field) reviews ("affirmative investigations"); and
- Create a more systematic process for monitoring performance of prioritized projects throughout implementation.

The piloted process will initially focus on Asian Development Bank projects and may be expanded to other MDBs and regions depending on the results of this initial phase.